

Intercontinental Terminals Company (ITC) Fire Morning Update Deer Park, Texas April 6, 2019 0000 - April 6, 2019 1159

Incident Management Objectives:

Objective 1: Ensure the health and safety of the public and response personnel.

Objective 2: Establish an incident management structure and processes employing the Incident Command System to enable effective overall management of the event with deployment of resources (staff and equipment) in a rapid, focused and well-coordinated manner.

Objective 3: Encourage a collaborative federalism approach, where Federal, State, Tribal, and local governments interact cooperatively and collectively to solve common problems.

Objective 4: Take actions to assess the on-site and off-site impacts during the emergency response phase of this incident. Provide this information to state and local authorities to assist them in their decision to protect the local citizens.

Objective 5: Conduct activities to prevent off-site releases from the ITC Tank Farm.

Objective 6: Respond to, mitigate and recovery off-site releases from the ITC Tank Farm.

Objective 7: Maintain open communication with Regional management

Incident Overview:

On March 17, 2019, an above ground storage tank containing Naphtha, caught fire at the Intercontinental Terminal Company (ITC), LLC facility in Deer Park Texas. The ITC facility consists of 15 80,000-barrel capacity above ground storage tanks containing petroleum products including Naphtha, Xylene, Toluene, Gasoline Blendstock, and Base Oil. Eleven of the 15 80,000-barrel capacity above ground storage tanks on site were involved in the fire, resulting in the release of contaminants into the atmosphere, as well discharging the contents of the tanks to drainage pathways. Firefighting water and foam potentially containing petroleum products were released from an outfall due to accumulation of water from firefighting efforts. Various firefighting organizations assisted in putting out the fire utilizing a variety of firefighting foams.

A partial breach of the tank farm containment wall on the northeast side near Tank 80-7 occurred at approximately 12:00 pm on March 22, 2019, to the ditched area and into Tucker Bayou. Additional boom was placed along the ditch leading to Tucker Bayou and Buffalo Bayou (Houston Ship Channel). The Responsible Party's contractor has rebuilt the containment wall using clay material.

At approximately 3:40 pm on March 22, 2019, three tanks reignited. The fire spread from the containment area through the breached containment wall into the ditch along Tidal Road. Foam was applied to the tanks and the ditch to extinguish the fire.

As a result of the fire, nine of the fifteen oil tanks had been burned and collapsed. One of the tanks had been burned and damaged, but not completely collapsed. Two tanks had become overheated and smoked but were not significantly damaged. Four of the tanks had smoked but did not burn.

During and after the fire and the breach of the secondary containment, several readings of benzene above 1.0 ppm were detected (highest was 16.5 near National Tank Services) by the various entities conducting air monitoring through the afternoon and night. These readings were located along the ship channel.

Due to the initial fires and subsequent releases, shelters in place have occurred throughout the week of March 17, 2019.

The United States Coast Guard (USCG) Captain of the Port is continuing the controlled open for the Ship Channel on March 26, 2019, with traffic during the daytime only. Decontamination vessels are being positioned to help ships that may have residue on the hulls.

A vessel decontamination plan was approved on March 27, 2019. The plan established procedures for decontamination of large and small vessels. Also, the plan describes how the decontamination team will utilize resources that include barge boats equipped with a hot water pressure washer, support boats for assessment team members, containment boom and absorbent sweep, rags, absorbent pads, cleaning agents, personal protective equipment (PPE), boat operators, and technicians.

At approximately 11:20 pm on March 29, 2019, ITC had sent out an e-notify recommending shelter-in-place to the surrounding industry and local officials after a significant benzene detection at the Vo-Pak facility north of the tank farm. At 1:25 am, Vo-Pak reported sheltering-in-place. The number and amount of benzene detections decreased throughout the following days due to the continued removal of product from tanks, their containment area and the continued use of foam. The decreased benzene detections allowed the facilities to lift their shelters-in-place. Rain events, such as the one on April 3, 2019, removed foam which had been sprayed on the tanks resulting in elevated benzene detections.

Executive Overview:

- On April 6, 2019, ITC reported that benzene air concentrations decreased to around 5 parts per million (ppm) in Division E (impacted tank farm).
- On April 6, 2019, ITC continued degassing tanks 80-14 and 80-15 using a thermal oxidizer to decrease off-gassing, and continued sludge break-up operations for tank 80-15. ITC continues to drain Tank 80-8 into Vac Trucks for transport to designated tanks for future disposal. The tanks are anticipated to be pumped down to residual amounts remaining by April 8, 2019.
- On April 6, 2019, after concurrence with Unified Command, ITC constructed an underflow dam at the junction of the railroad tracks and west side of Tidal Road in anticipation of heavy rainfall on April 7-8, 2019.
- On April 6, 2019, the air strike team (Environmental Protection Agency (EPA), Texas
 Commission on Environmental Quality (TCEQ), and ITC) returned to the Southwest
 Shipyard due to benzene being detected at 0.6 ppm. The team reported that a plume
 was coming from shipyard. The air strike team noted at the time that the wind direction
 was coming from the south-southeast.

- On April 6, 2019, the water strike team did a follow-up investigation of a fish kill reported
 at the San Jacinto River Waste Pit, a SUPERFUND National Priorities List (NPL) site.
 The location of the SUPERFUND site is in the vicinity of the Southwest Shipyard facility.
 At approximately 1:00 pm, the water strike team briefly detected benzene at 0.5 ppm on
 the west side of the island. However, the benzene reading was not sustained long
 enough for a 60-second average detection. The water strike team did not find dead fish
 nor a sheen on the water on any side of the NPL site.
- Harris County Fire Marshall will tentatively begin the fire cause investigation at the tank farm on April 9, 2019.
- On April 6, 2019, ITC responded to two resident complaints about foam reported to TCEQ and Harris County Pollution Control Services Department in Channel View. ITC reported that no foam was present at one of the residential properties. ITC was unable to gain access from the homeowner at the other property.
- ITC continued 24-hour operations for flushing Tucker Bayou on April 6, 2019. EPA estimates that operations at Tucker Bayou are about 60 percent complete.
- ITC continues applying foam to the tanks and tank farm area as needed.
- EPA conducted surface water sampling on April 6, 2019, at nine sample locations. The surface water samples were collected along Buffalo Bayou and the San Jacinto River, and will be analyzed for PFAS, VOCs, SVOCs, COD, and Oil & Grease. The results from the sampling event were compared to the TCEQ Surface Water Quality Standards (WQS), or to TCEQ Texas Risk Reduction Program surface water protective concentration levels (PCLs), if a WQS was not available for a chemical. On March 21, 2019, the surface water sample collected at the confluence of Tucker Bayou and Buffalo Bayou (BB-02) exceeded the PCLs for oil and grease, naphthalene, benzene and total xylenes. On March 25, 2019, the surface water sample collected on Buffalo Bayou at the Battleship Texas (BB-05) exceeded the PCL for oil and grease. No other exceedances have been observed.
- Several entities including TCEQ, EPA, and ITC continue to conduct air monitoring around the tank farm, in adjoining industrial areas, and communities downwind from the facility.
- EPA conducted handheld air monitoring on April 6, 2019, from 00:00 to 23:59 at 51 locations. Results were reported above the detection limit at four locations for total volatile organic compounds (VOCs) and at one location for benzene. Benzene was detected above the Texas Commission on Environmental Quality (TCEQ) short-term Air Monitoring Comparison Value (AMCV) (0.18 ppm). EPA will continue to conduct additional air monitoring.
- TCEQ continued handheld air monitoring on April 6, 2019 in the surrounding communities, from 12:00 am to 10:00 pm; no readings above the Unified Command action level were detected.
- The Airborne Spectral Photometric Environmental Collection Technology (ASPECT) aircraft did not fly during this reporting period due to maintenance. The aircraft will return on April 8, 2019, if weather conditions are suitable.
- EPA conducted air sampling using the Trace Atmospheric Gas Analyzer (TAGA) on April 6, 2019. The TAGA analyzed the air samples for benzene, toluene and xylene. The TAGA air sampling results were compared to the TCEQ short-term AMCVs and found no exceedances of the short-term AMCVs for toluene or xylene. The TAGA found a single exceedance of the short-term AMCV for benzene at a location northeast of the Port of Houston-Jacinto port. These results have been shared with unified command and local officials.ITC continued community air monitoring on April 6, 2019 (12:00 am to 11:59 pm); there were 811 VOC readings (1 detections) and 257 benzene readings (1 detections).
- As of Friday, April 6, 2019:
 - 147,300 feet of boom deployed
 - o 106,723 bbl of product/water recovered from water operations
 - o 153,980 bbl of product/water recovered from tank farm

 Approximately 465,000 gallons of foam concentrate used for firefighting/suppression and emission suppression

Total Vessels as of April 6, 2019						
Work Boats	Barges	Small Capacity Skimming Vessels	Skimmers	Total Vessels		
109	100	25	119	353		

Tank Status	Tank No.
Complete*	80-2, 80-3, 80-7, 80-9, 80-10, 80-12, 80-13, 80-14, 80-15
Standby	80-1, 80-4, 80-5, 80-6, 80-8, 80-11

^{*}The tank status are estimates provided by ITC based on thermal imaging calculations. The tanks with complete status may have residual products and/or may be partially refilled by overspray, foam, or containment water due to other tank operations.

Coordination with State Agencies:

On March 17, 2019, in response to a tank fire at the ITC, federal, state and local agencies joined ITC in a Unified Command. Multiple agencies including the United States Coast Guard, the TCEQ, and Harris County Pollution Control Services supported the response effort.

EPA Resources:

Personnel	EPA R6 Dallas	ITC Deer Park	Total
EPA Region 6	11	7	18
EPA Non-Region 6	0	3	3
START	1	21	22
Other Contractors	0	3	3
Total	12	35	46

Additional Information: Air Monitoring and Water Sampling locations, and Waste Storage Tanks:

